

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 955-6631

E-Mail Address: KerstingA@dsmo.com

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March 7, 2002

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**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, N.E.  
Suite 110  
Washington, D.C. 20002

MAR - 7 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Amendment of Section 73.606(b),  
Table of Allotments, TV Broadcast Stations  
(Green Bay, Wisconsin)  
MM Docket No. 01-325; RM-10136

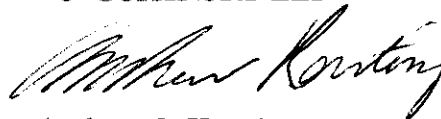
Dear Ms. Salas:

Transmitted herewith on behalf of Green Bay 44, L.L.C. are an original and four copies of its "Reply to Informal Opposition" filed in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate directly with the undersigned.

Very truly yours,

DICKSTEIN SHAPIRO MORIN  
& OSHINSKY LLP



Andrew S. Kersting  
Counsel for  
Green Bay 44, L.L.C.

Enclosure

cc: Certificate of Service (w/ encl.) (by hand)

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Before the  
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MAR - 7 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.606(b),  
Table of Allotments,  
Television Broadcast Stations,  
(Green Bay, Wisconsin)

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MM Docket No. 01-325  
RM-10136

To: Chief, Video Services Division

**REPLY TO INFORMAL OPPOSITION**

Green Bay 44, L.L.C. ("Green Bay 44"), by counsel, hereby submits its response to the "Informal Opposition," filed February 15, 2002 ("Opposition"), in the above-captioned proceeding by Television Wisconsin, Inc. ("WISC"), licensee of Station WISC-DT, Channel 50, Madison, Wisconsin. In support of this reply, the following is stated:

**I. The Informal Opposition Is an Unauthorized Pleading and Should Be Dismissed.**

The *Notice of Proposed Rule Making*, DA 01-2753 (released November 30, 2001) ("*NPRM*"), announced comment and reply comment deadlines in this proceeding of January 21 and February 5, 2002, respectively. On January 18, 2002, WISC filed comments in this proceeding in which it argued that the proposed allotment of Channel 50+ at Green Bay, Wisconsin, would cause prohibited interference to the maximized facilities of Station WISC-DT, Madison.

In response to WISC's comments, Green Bay 44 filed reply comments on February 5, 2002, in which it demonstrated that, by reducing the ERP of the proposed Green Bay NTSC facility by 3 dB and rotating the station's directional antenna pattern so

that the null was placed in the direction of Station WISC-DT, the interference to the co-channel DTV station would be reduced to 0.483%, which is within the rounding tolerance. *See* Green Bay 44 Reply Comments at 2. Ten days after the period for filing reply comments closed, WISC filed its Opposition in which it now argues, for the first time, that the proposed Green Bay station is required to protect WISC-DT's maximized facilities using the rounded baseline population contained in the 1997 DTV Table of Allotments.<sup>1</sup> This argument should have been raised in WISC's initial comments. Instead, WISC waited until over three and one-half weeks after the comment deadline in which to challenge Green Bay 44's allotment proposal on the basis that it did not protect WISC-DT's maximized facility using the Commission's baseline population figure.

Section 1.415 of the Commission's rules provides that, after a notice of proposed rulemaking is issued, the Commission will afford interested parties a reasonable period of time in which to file comments and reply comments. Section 1.415(d) expressly provides that "[n]o additional comments may be filed unless specifically requested or authorized by the Commission." 47 C.F.R. §1.415(d). Thus, WISC's Opposition is an unauthorized pleading which should be summarily dismissed. Indeed, WISC failed to offer any explanation for why it waited until 3½ weeks after the comment deadline to challenge the proposed allotment on the basis of WISC-DT's allotment population, or why it could not have raised this argument during the comment period. Furthermore, the Opposition is not accompanied by any motion for leave to accept the unauthorized pleading, nor did WISC make any effort to establish good cause for its late filing.

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<sup>1</sup> *See Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order*, 13 FCC Rcd 7418, 7682 (Appendix B) (1998) ("MO&O on Recon. of the Sixth R&O").

The acceptance of unauthorized pleadings would have a significant adverse impact on the Commission's decision-making processes because it would result in prolonged delays, prejudice other parties, and place an unnecessary burden on the Commission's staff. As example of this impact is reflected in the "Comments in Support of Informal Opposition," filed March 5, 2002, by WPBN/WTOM License Subsidiary, Inc., licensee of Station WPBN-TV, Traverse City, Michigan ("WPBN"). WPBN's comments were filed a full month after the reply comment deadline in this proceeding.<sup>2</sup> Despite having constructive notice of the *NPRM* and, thus, the comment and reply comment deadlines in this proceeding, WPBN now seeks to have its "comments" considered in connection with WISC's unauthorized pleading. Consideration of WISC's Opposition and WPBN's supporting "comments" would cause an unwarranted delay in the resolution of this proceeding and prejudice Green Bay 44, which has complied with the Commission's procedural rules.

It is well established that strict enforcement of the Commission's procedural rules is necessary in order to avoid prolonged delays in the Commission's administrative processes and to promote administrative finality.<sup>3</sup> The Commission should not accept unauthorized pleadings – especially those like WISC's and WPBN's – which could have been filed in a timely manner and in which no effort is made to establish good cause for their late filing. Therefore, pursuant to Section 1.415(d) of the Commission's rules, WISC's unauthorized pleading should be summarily dismissed.

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<sup>2</sup> Green Bay 44 received WPBN's comments on March 6, 2002, and will respond to them in a timely manner.

<sup>3</sup> See *Amendment of the Commission's Rules Regarding the 37.0 – 38.6 GHz and 38.6 – 40.0 GHz Bands; Implementation of Section 309(j) of the Communications Act – Competitive Bidding, 37.0 – 38.6 GHz and 38.6 – 40.0 GHz Bands*, 15 FCC Rcd 10579, 10580 (2000); *Valley Telecasting Co. v. FCC*, 336 F.2d 914, 917 (1964).

## II. The Proposed Green Bay Station Will Not Cause Interference to WISC-DT.

WISC contends that the proposed allotment of Channel 50+ at Green Bay would cause prohibited interference to WISC-DT's maximized facilities using the baseline population data contained in the 1997 DTV Table of Allotments.<sup>4</sup> Opposition at 2. Green Bay 44 recognizes that, in light of the literal language contained in *Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, MM Docket No. 00-39, *Memorandum Opinion and Order on Reconsideration*, 16 FCC Rcd 20594, 20616 ¶61 (2001), the proposed allotment of Channel 50+ at Green Bay may be required to protect WISC's maximized facilities using the baseline population figure. As noted by Donald Everist in the same DTV review proceeding, however, use of allotment population can produce anomalous results when a station's allotment facilities have been substantially modified. *See Id.* at ¶60. For example, in this case, WISC-DT's allotment facilities provide for 380.2 kW ERP at an antenna height of 469 meters above average terrain. *MO&O on Recon. of the Sixth R&O*, 13 FCC Rcd at 7682 (Appendix B). However, WISC-DT currently is authorized to operate with 603 kW ERP with an antenna height of 466 meters above average terrain. *See* File No. BPCDT-19991027ABG. Thus, although WISC-DT's maximized facility operates at approximately the same antenna height as its allotment facility, the station now is authorized to operate with an increase in ERP of 223 kW, which represents a 59% increase in power.

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<sup>4</sup> In support of its position, WISC cites, *inter alia*, *Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, Report and Order and Further Notice of Proposed Rulemaking*, 16 FCC Rcd 5946, 5975 ¶82 (2001). *See* Opposition at 2 n.4. However, paragraph 82 of the above order discusses inconsistencies in the Commission's database with respect to terrain elevations. It does not support – much less address – the use of baseline population data contained in the 1997 Table of Allotments.

As demonstrated in the attached engineering statement and Exhibit FLR-1 thereto, WISC-DT now covers substantially more people than its allotment population of 1,315,000 persons. Using 1990 Census data, WISC-DT's maximized facilities enable the digital station to cover 1,435,588 people. Green Bay 44 respectfully submits that the proposed Channel 50+ NTSC facility at Green Bay should not be required to protect a 1997 baseline population of 1,315,000 people when, as a result of its maximized facilities, WISC-DT now is operating with nearly a 60% power increase and covers 120,586 more people. *See* Engineering Statement at 1. There simply is no logical basis upon which to conclude that the proposed Channel 50+ facility would cause 0.5% interference to the population *actually served* by WISC-DT.

Nevertheless, in the event the Commission were to require the proposed Green Bay station to protect WISC-DT's baseline population, the proposed Channel 50+ facility could protect WISC-DT's maximized facility by using a modified directional antenna pattern and lowering its ERP to 801.733 kW. *See* Engineering Statement at 1.

### **III. WISC's Argument Regarding the Technical Facilities of the Proposed New Analog Station at Green Bay Has No Merit.**

WISC also argues that the proposed allotment of Channel 50+ to Green Bay is flawed because it "proposes minimal facilities that cannot form the basis for an allotment." Opposition at 2. WISC claims that because the Commission's rules permit UHF stations to operate with 5 megawatts ERP with an antenna height of 2,000 feet above average terrain, the proposed Channel 50+ facility would be a "crippled allotment that would . . . complicate the ability of WISC and others to make future modifications to their facilities . . ." *Id.* at 2-3.

It is no surprise that WISC fails to cite any authority to support its argument regarding the technical facilities of the proposed allotment at Green Bay. Indeed, the full

Commission has previously rejected the argument that a proposal for a new analog station should be denied because it would adversely affect a DTV station's ability to maximize its facility at some point in the future. *Achernar Broadcasting Company*, 15 FCC Rcd 7808, 7819 (2000). Furthermore, as demonstrated in the attached engineering statement, even assuming, *arguendo*, that the proposed Green Bay station were required to operate with a lowered ERP in order to protect WISC-DT's maximized facility using the 1997 baseline population, the technical facilities of the proposed Channel 50+ station at Green Bay are comparable to those of at least nine (9) other full-service analog stations in Wisconsin, three of which are licensed to communities in the Green Bay–Appleton DMA: WACY(TV), Appleton; WPNE(TV)\*, Green Bay; and WIWB(TV), Suring. *See* Engineering Statement at 3. Therefore, WISC's claim that the proposed allotment of Channel 50+ at Green Bay should be rejected due to the nature of the station's technical facilities should be rejected.

#### **IV. Conclusion.**

As demonstrated herein, WISC's grossly untimely Opposition is an unauthorized pleading filed in violation of Section 1.415(d) of the Commission's rules. Moreover, the Opposition is not accompanied by any motion to accept and is woefully void of any good cause showing. Therefore, because strict enforcement of the Commission's procedural rules is necessary to avoid endless delays in the agency's decision-making process and to promote administrative finality, WISC's Opposition should be summarily denied.

Even assuming, *arguendo*, that the Opposition is considered on its merits, the proposed allotment of Channel 50+ to Green Bay will not cause prohibited interference to WISC-DT's maximized facilities, even if the DTV station's allotment population is used as a basis for determining the extent of that interference. WISC's assertions regarding the

proposed new analog station's technical facilities also should be rejected because the proposed facilities are comparable to those of at least nine (9) other Wisconsin television stations, three of which are located in the same DMA.

WHEREFORE, in light of the foregoing, Green Bay 44, L.L.C. respectfully requests that the Commission either dismiss or deny WISC's unauthorized pleading, adopt the allotment proposal set forth in the *NPRM*, and amend the NTSC Table of Allotments by substituting Channel 50+ for the existing Channel 44 allotment at Green Bay, Wisconsin.

Respectfully submitted,

Dickstein Shapiro Morin & Oshinsky LLP  
2101 L Street, N.W.  
Washington, DC 20037-1526  
(202) 785-9700

Attorneys for  
GREEN BAY 44, L.L.C.

By:   
Andrew S. Kersting

March 7, 2002

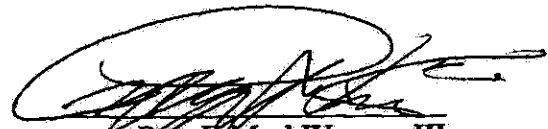


**WES Broadcast Consultants.**

**DECLARATION**

I, Pete E Myrl Warren, III, declare and state that I am a Certified Broadcast Engineer, by the National Association of Radio and Television Engineers, and my qualifications are a matter of record with the Federal Communications Commission, and that I am an engineer in the firm of WES Broadcast Consultants and that the firm has been retained to prepare an engineering statement on behalf of Green Bay 44 LLC.

All facts contained herein are true to my knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. All Exhibits were prepared by me or under my supervision. I declare under penalty of perjury that the foregoing is true and correct.



Pete E Myrl Warren, III

Executed on the 6th day of March 2002

**Engineering Statement  
Green Bay, Wisconsin  
Channel 50+  
Proposed Rulemaking  
By WES Broadcast Consultants**

This engineering statement is provided in support of a pending rulemaking petition seeking the allotment of Channel 50+ at Green Bay, Wisconsin.

In an effort to ensure that the proposed allotment of Channel 50+ at Green Bay provides adequate protection to Station WISC-DT, Channel 50, Madison, Wisconsin, Green Bay 44, L.L.C. proposes to reduce the ERP of the proposed Channel 50+ NTSC facility at Green Bay by 3 dB. The petitioner also proposes to modify its original directional antenna pattern and utilize a C pattern (reflected in Exhibit ANT-1 hereto) which has been positioned to provide maximized protection to WISC-DT.

WISC-DT's Maximized Facility. The attached Exhibit FLR-1 contains an OET 69 study concerning WISC-DT's maximized facility. This study is based on a 1990 Census population of 1,435,588 persons. This population figure includes 120,586 persons who were not included in the Commission's rounded baseline population of 1,315,000, which is contained in the 1997 DTV Table of Allotments. These additional persons therefore fall outside WISC-DT's original allotment. Using this population data, the proposed Channel 50+ NTSC facility would cause 0.46% interference to WISC-DT's maximized facility, which is within the 0.5% rounding tolerance.

WISC-DT's Allotment. The attached Exhibit FLR-2 contains an OET 69 study with respect to WISC-DT's protected allotment. This study is based on a 1990 Census population of 1,319,671 persons, which includes 4,671 persons who fall outside the Commission's rounded 1997 baseline population. Based on this population figure, the proposed Channel 50+ NTSC facility would cause 0.01% interference to WISC-DT's allotment.

WISC-DT's Maximized Facility Using Baseline Population. In the event the Commission were to require the proposed Channel 50+ NTSC facility at Green Bay to protect WISC-DT's maximized facility using the Commission's rounded baseline population, the proposed Channel 50+ allotment could protect WISC-DT utilizing the C directional antenna pattern referenced above, but with a lowered ERP of 801.733 kW. As demonstrated in the attached Exhibit FLR-3, the proposed Channel 50+ facility would cause 0.5% interference to WISC-DT's maximized facility, which is within the rounding tolerance. As demonstrated in the attached Exhibit LR-1, if the proposed Channel 50+ NTSC facility were to operate with the lowered ERP, it still would provide an 80 dBu signal over the entire community of Green Bay and the immediately surrounding area.

WPBN-DT. As demonstrated in the attached Exhibits FLR-4a and FLR-4b, the proposed allotment of Channel 50+ at Green Bay will cause 0.09% and 0.08% interference to the allotment and construction permit facilities, respectively, of Station WPBN-DT, Channel 50, Traverse City, Michigan.

Technical Facilities of Proposed Allotment. In light of the allegations which have been raised concerning the technical facilities of the proposed Channel 50+ NTSC facility at Green Bay, annexed hereto is a list of television stations licensed to communities in the state of Wisconsin which operate with technical facilities comparable to those of the proposed Channel 50+ allotment.

**Technical Facilities of Various Television Stations**  
**Licensed to Communities in Wisconsin**

<b><u>Station</u></b>	<b><u>ERP (kW)</u></b>	<b><u>RCAMSL (meters)</u></b>
WXOW-TV, Ch. 19, La Crosse	631	615
WQOW-TV, Ch. 18, Eau Claire	912	558
WHA-TV, Ch. 21, Madison	1,120	754
WPNE, Ch. 38, Green Bay	1,070	585
WIWB, Ch. 14, Suring	1,000	442
WVCY-TV, Ch. 30, Milwaukee	1,070	502
WMTV, Ch. 15, Madison	955	650
WHRM-TV, Ch. 20, Wausua	1,380	755
WACY, Ch. 32, Appleton	1,050	587

Average ERP = 1,021 kW

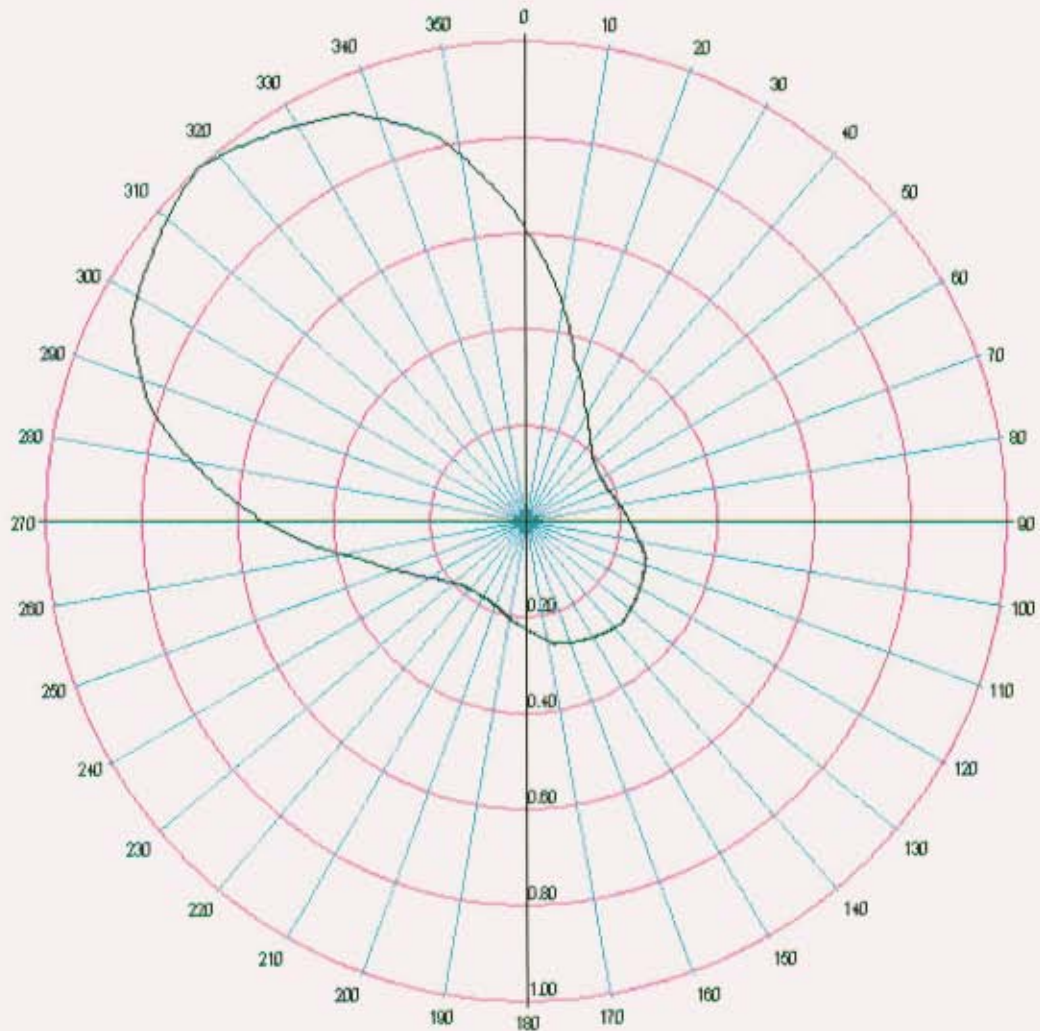
Average RCAMSL = 605.33 meters

Proposed Channel 50 NTSC Facility at Green Bay (assuming lowered ERP):

ERP = 802 kW (rounded)

RCAMSL = 573 meters

**Exhibit ANT-1 Green Bay, WI Ch 50 Proposed Rulemaking  
by WES Broadcast Consultants**



Azim	RelFS	ERP [kW]	dBk	Azim	RelFS	ERP [kW]	dBk	Azim	RelFS	ERP [kW]	dBk	Azim	RelFS	EF
0.0	0.612	375.433	25.745	90.0	0.216	46.767	16.699	180.0	0.224	50.295	17.015	270.0	0.548	
5.0	0.532	283.696	24.529	95.0	0.226	51.197	17.092	185.0	0.214	45.905	16.619	275.0	0.628	
10.0	0.455	207.517	23.171	100.0	0.239	57.257	17.578	190.0	0.204	41.715	16.203	280.0	0.708	
15.0	0.380	144.743	21.606	105.0	0.254	64.669	18.107	195.0	0.194	37.725	15.766	285.0	0.788	
20.0	0.326	106.528	20.275	110.0	0.263	69.333	18.409	200.0	0.187	35.052	15.447	290.0	0.850	
25.0	0.286	81.990	19.138	115.0	0.268	71.995	18.573	205.0	0.182	33.203	15.212	295.0	0.900	
30.0	0.255	65.179	18.141	120.0	0.273	74.706	18.734	210.0	0.180	32.477	15.116	300.0	0.932	
35.0	0.230	53.026	17.245	125.0	0.278	77.468	18.891	215.0	0.180	32.477	15.116	305.0	0.952	
40.0	0.211	44.627	16.496	130.0	0.283	80.279	19.046	220.0	0.183	33.569	15.259	310.0	0.972	
45.0	0.196	38.507	15.855	135.0	0.288	83.141	19.198	225.0	0.188	35.428	15.493	315.0	0.992	
50.0	0.187	35.052	15.447	140.0	0.287	82.565	19.168	230.0	0.199	39.695	15.987	320.0	0.988	
55.0	0.182	33.203	15.212	145.0	0.282	79.713	19.015	235.0	0.214	45.905	16.619	325.0	0.968	
60.0	0.180	32.477	15.116	150.0	0.277	76.911	18.860	240.0	0.235	55.356	17.432	330.0	0.948	
65.0	0.180	32.477	15.116	155.0	0.272	74.160	18.702	245.0	0.260	67.761	18.310	335.0	0.928	
70.0	0.183	33.569	15.259	160.0	0.267	71.458	18.541	250.0	0.294	86.641	19.377	340.0	0.890	
75.0	0.188	35.478	15.403	165.0	0.267	68.807	18.376	255.0	0.234	111.871	20.485	345.0	0.840	

Exhibit FLR-1  
Proposed Rulemaking  
Greenbay, WI Ch 50  
prepared by Wes, Inc. Broadcast Consultants

Ch 50      N LAT 44-30-48      W LON 88-00-24      ERP: 1002,374 kW AGL:391m GMSL:182m RCMSL:573m

Call sign	City	Class	Status	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength
WISC-DT	MADISON	DTV	CP	603	D/M	Clean	203	194	9.2	2	10	14	1	UHF	50	Co	LR	F(50,90)	41

Population before the addition of Ch 50 to the database not affected by terrain losses: 1,435,588 persons  
Population lost to NTSC before the addition of Ch 50: 61,510 persons  
Population after the loss to NTSC: 1,374,078 persons  
Population after the addition of Ch 50 to the database: 1,367,332 persons  
Population lost to NTSC with Ch 50: 6,746 persons  
Percentage of population lost with Ch 50: 0.46 %

Exhibit FLR-2  
Proposed Rulemaking  
Greenbay, WI Ch 50  
prepared by Wes, Inc. Broadcast Consultants

Ch 50 N LAT 44-30-48 W LON 88-00-24 ERP: 1002.374 kW AGL:391m GAMSL:182m RCAMSL:573m

Call sign	City	Class	Status	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength
WISC-TV*	MADISON	DTV	LIC	380	D/M	Clean	203	194	9.2	2	10	14	1	UHF	50	Co	LR	F(50,90)	41

Population before the addition of Ch 50 to the database not affected by terrain losses: 1,319,871 persons

Population lost to NTSC before the addition of Ch 50: 34,622 persons

Population after the loss to NTSC: 1,285,049 persons

Population after the addition of Ch 50 to the database: 1,284,871 persons

Population lost to NTSC with Ch 50: 178 persons

Percentage of population lost with Ch 50: 0.01 %

Exhibit FLR-3  
Proposed Rulemaking  
Greenbay, WI Ch 50  
prepared by Wes, Inc. Broadcast Consultants

Ch 50      N LAT 44-30-48      W LON 88-00-24      ERP: 801.733 kW AGL:391m GMSL:182m RCMSL:573m

Callign	City	Class	Status	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength
WISC-DT	MADISON	DTV	CP	603	D/M	Clean	203	194	9.2	2	10	14	1	UHF	50	Co	LR	F(50,90)	41

Population before the addition of Ch 50 to the database not affected by terrain losses: 1,315,000 persons

Population lost to NTSC before the addition of Ch 50: 0 persons

Population after the loss to NTSC: 1,374,078 persons

Population after the addition of Ch 50 to the database: 1,387,482 persons

Population lost to NTSC with Ch 50: 6,596 persons

Percentage of population lost with Ch 50: 0.50 %



Exhibit FLR-4a  
Greenbay, WI Ch 50  
Amendment to Pending Rulemaking  
prepared by Wes, Inc. Broadcast Consultants

Ch 50      N LAT 44-30-48      W LON 88-00-24      ERP: 2000 kW AGL:391m GMSL:182m RCMSL:573m

Callsign	City	Class	Status	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength
WPBN-TV*	TRAVERSE	CDTV	Allotm	1000	D/M	Clean	184	194	-9.9	2	10	14	2 UHF	50	Co	LR	F(50,90)		41

Population before the addition of Ch 50 to the database not affected by terrain losses:	403,051 persons
Population lost to NTSC before the addition of Ch 50:	1,660 persons
Population after the loss to NTSC:	401,391 persons
Population after the addition of Ch 50 to the database:	401,009 persons
Population lost to NTSC with Ch 50:	382 persons
Percentage of population lost with Ch 50:	0.09 %

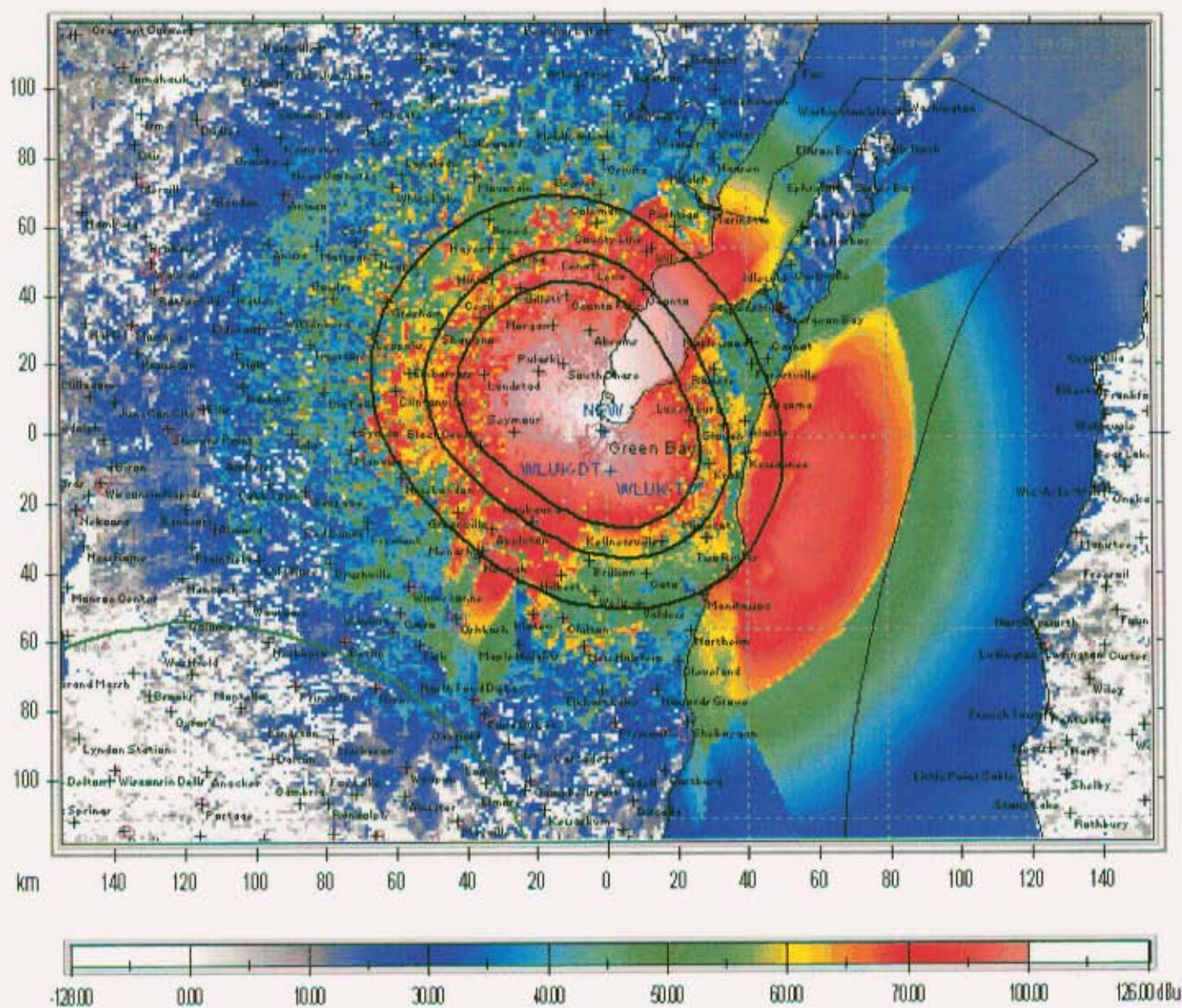
Exhibit FLR-4b  
Greenbay, WI Ch 50  
Amendment to Pending Rulemaking  
prepared by Wes, Inc. Broadcast Consultants

Ch 50      N LAT 44-30-48      W LON 88-00-24      ERP: 2000 kW AGL:391m GMSL:182m RCAMSL:573m

Callsign	City	Class	Status	ERP	Sep Type	Status	Dist	Prot	Clearance	D/U	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Contour	Svc Strength
WPBN-DT	TRAVERSE	CDTV	CP	1000	D/M	Clean	184	194	-9.9	2	10	14	2 UHF	50	Co	LR	F(50,90)		41

Population before the addition of Ch 50 to the database not affected by terrain losses:	389,243 persons
Population lost to NTSC before the addition of Ch 50:	1,130 persons
Population after the loss to NTSC:	388,113 persons
Population after the addition of Ch 50 to the database:	387,803 persons
Population lost to NTSC with Ch 50:	310 persons
Percentage of population lost with Ch 50:	0.08 %

Longley-Rice Field Strength w/ 64.74 &amp; 80 db Contours Superimposed



### CERTIFICATE OF SERVICE

I hereby certify that on this 7<sup>th</sup> day of March, 2002, a copy of the foregoing  
“Reply to Informal Opposition” was mailed first-class, postage prepaid, to the following:

Roy J. Stewart\*  
Chief, Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-C347  
445 Twelfth Street, S.W.  
Washington, DC 20554

Barbara Kreisman\*  
Chief, Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-A666  
445 Twelfth Street, S.W.  
Washington, DC 20554

Clay Pendarvis\*  
Chief, Television Branch  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-A662  
445 Twelfth Street, S.W.  
Washington, DC 20554

Gordon Godfrey\*  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-C120  
445 Twelfth Street, S.W.  
Washington, DC 20554

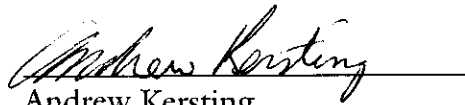
Nazifa Naim\*  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-C834  
445 Twelfth Street, S.W.  
Washington, DC 20554

Pamela Blumenthal\*  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
The Portals II, Room 2-A762  
445 Twelfth Street, S.W.  
Washington, DC 20554

Robert J. Rini, Esq.  
Sarah E. Stephens, Esq.  
Manatt, Phelps & Phillips, L.L.P.  
1501 M Street, N.W., Suite 700  
Washington, DC 20005  
(Counsel for Television Wisconsin, Inc.)

David D. Oxenford, Esq.  
Veronica D. McLaughlin, Esq.  
Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037-1128  
(Counsel for Ace TV, Inc.)

Jonathan D. Blake, Esq.  
Jennifer A. Johnson, Esq.  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
Washington, DC 20004-2401  
(Counsel for WPBN/WTOM License  
Subsidiary, Inc.)

  
Andrew Kersting

\* Hand Delivered